



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 31, 2023

BY ECF

The Honorable J. Paul Oetken
United States District Court Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. John Costanzo Jr. and Manuel Recio, 22 Cr. 281 (JPO)*

Dear Judge Oetken:

The Government writes in response to counsel's letter, filed at 1:59 a.m. this morning, seeking to introduce multiple exhibits under the rule of completeness during the testimony of witnesses Rachel Danko and Michael Nadler. The Court ordered defense counsel to confer with the Government about rule of completeness objections. Defense counsel did not do so, but rather filed this motion with no prior discussion. If defense counsel had conferred with the Government, they would have learned that the Government is amenable to taking steps to moot several of the issues they raise. The Government recognizes that all the parties are busy with trial. The Government nonetheless respectfully repeats its request that defense counsel confer with the Government, per the Court's order, about rule of completeness objections prior to filing a motion with the Court.

Respectfully submitted,

DAMIAN WILLIAMS
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